

EXCERPTS FROM THE DEPOSITION OF
SAM TELLER
TAKEN AUGUST 11, 2021

1 UNITED STATES DISTRICT COURT

2 FOR THE NORTHERN DISTRICT OF CALIFORNIA

3 SAN FRANCISCO DIVISION

4 In Re: -----x

5 TESLA, INC.

Civil Action No.
3:18-cv-04865-EMC

6 SECURITIES LITIGATION
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9 * * * C O N F I D E N T I A L * * *

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13 CONFIDENTIAL REMOTE VIDEOTAPED DEPOSITION OF

14 SAM TELLER

15 Roberts Creek, British Columbia

16 Wednesday, August 11, 2021

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22 Reported by:

23 THOMAS A. FERNICOLA, RPR

24 JOB NO. 198117

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Wednesday, August 11, 2021

9:00 a.m.

CONFIDENTIAL REMOTE VIDEOTAPED DEPOSITION of
SAM TELLER, held before Thomas A. Fernicola, a
Registered Professional Reporter and Notary Public of
the State of New York.

A P P E A R A N C E S

(All Attendees Appearing Via Videoconference and/or
Telephonically):

LEVI & KORSINSKY

Attorneys for Plaintiffs

1101 30th Street Northwest

Washington, DC 20007

BY: ELIZABETH TRIPODI, ESQ.

KATHY AMES, ESQ.

COOLEY

Attorneys for Tesla

3175 Hanover Street

Palo Alto, CA 94304

BY: PATRICK GIBBS, ESQ.

BINGXIN WU, ESQ.

ALSO PRESENT:

MICHAEL BROWN, Videographer

CANDICE JACKMAN, In-House Counsel, Tesla.

1 THE VIDEOGRAPHER: Good morning.
2 My name is Michael Brown. I'm a Legal
3 Videographer in association with TSG
4 Reporting.

5 Due to the severity of the
6 COVID-19 pandemic and following the
7 practice of social distancing, I will
8 not be in the same room as the witness.
9 Instead, I will be recording this
10 videotaped deposition remotely.

11 The reporter, Tom Fernicola, also
12 will not be in the same room and will
13 swear the witness remotely.

14 Do all parties stipulate to the
15 validity of this video recording and
16 remote swearing, and that it will be
17 admissible in the courtroom following
18 Rule 30 of the Federal Rules of Civil
19 Procedures and the state's rules where
20 this case is pending?

21 MS. TRIPODI: Good morning. My
22 name is Elizabeth Tripodi. I'm with
23 Levi & Korsinsky, LLP, and I'm here
24 today representing plaintiff, and I
25 agree.

1 With me today is my co-counsel
2 Kathy Ames also from my firm.

3 MR. GIBBS: Good morning. This is
4 Patrick Gibbs from Cooley representing
5 the defendants as well as Mr. Teller.

6 We also agree to the remote
7 format.

8 With me today are my colleagues
9 Bingxin Wu, and here from Tesla is
10 Candace Jackman.

11 THE VIDEOGRAPHER: This marks the
12 beginning of Video 1 of the Deposition
13 of Sam Teller in the matter of In Re:
14 Tesla, Inc. Securities Litigation.

15 Today's date is August 11. The
16 time on the video monitor is 9:09 a.m.

17 Will the court reporter please
18 swear in the witness.

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1 SAM TELLER,
2 called as a witness, having been duly sworn by a
3 Notary Public, was examined and testified as
4 follows:

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

DEPOSITION TESTIMONY
FILED UNDER SEAL

C E R T I F I C A T E

STATE OF NEW YORK)

) ss.:

COUNTY OF NEW YORK)

I, THOMAS A. FERNICOLA, Registered
Reporter and Notary Public within and
for the State of New York, do hereby
certify that the within is a true and
accurate transcript of the proceedings
held on Wednesday, August 11, 2021.

That I am not related to any of
the parties to this action by blood or
marriage; and that I am in no way
interested in the outcome of this
matter.

IN WITNESS WHEREOF, I have
hereunto set my hand this 23rd day of
August 2021.



THOMAS A. FERNICOLA, RPR